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Attorney for Defendant Frank Vienna


IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 19-00099 DKW
	)	
Plaintiff,	)	MOTION FOR WITHDRAWAL
	)	AND SUBSTITUTION OF
vs.	)	COUNSEL
	)	
DAE HAN MOON,	)	
	)	
Defendant.	)	
<hr/>	)	

**MOTION FOR WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

COMES NOW court-appointed counsel Cary Virtue, attorney for defendant, Dae Han Moon, and moves this Honorable Court to allow him to withdraw as counsel, and for substitution of new counsel due to a material breakdown in the attorney-client relationship.

DATED: Honolulu, Hawaii, August 6, 2021.

  
/s/ Cary Virtue  
Cary Virtue  
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 19-cr-00099 DKW-KJM
	)	
Plaintiff,	)	DECLARATION OF COUNSEL
	)	
vs.	)	
	)	
DAE HAN MOON,	)	
	)	
Defendant.	)	
	)	

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**DECLARATION OF COUNSEL**

I, CARY VIRTUE, hereby declare as follows:

1. I am the court-appointed counsel for Defendant Dae Han Moon, having been appointed pursuant to the Criminal Justice Act on July 16, 2020.
2. A material breakdown in the attorney-client relationship has occurred, and an effort to repair the relationship was not successful.
3. On August 6, 2021 Moon notified counsel that due to the irreparable breakdown in the attorney-client relationship, he is requesting that I withdraw and new CJ court-appointed counsel be assigned.
4. I respectfully ask permission to withdraw, and that new court-appointed counsel be appointed for Moon.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

DATED: Honolulu, Hawaii, August 6, 2021.

  
/s/ Cary Virtue  
Cary Virtue  
Attorney for Defendant  
Dae Han Moon

CERTIFICATE OF SERVICE

I, Cary Virtue, hereby certify that a true and exact copy of the foregoing document was delivered electronically to the following on August 6, 2021:

Michael Nammer  
Mark Inciong  
Micah Smith  
Assistant United States Attorneys  
PJKK Federal Building  
300 Ala Moana Boulevard, Room 6100  
Honolulu, Hawaii 96813

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

DATED: Honolulu, Hawaii, August 6, 2021

/s/ Cary Virtue  
Cary Virtue  
Attorney for Defendant  
Dae Han Moon